

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

LAWRENCE BLITZ, Individually and on)	Civil Action No. 3:11-cv-00992
Behalf of All Others Similarly Situated,)	
)	<u>CLASS ACTION</u>
Plaintiff,)	
vs.)	Chief Judge Todd J. Campbell
)	Magistrate Judge E. Clifton Knowles
AGFEED INDUSTRIES, INC., et al.,)	
)	
Defendants.)	
)	
)	

KEVIN SOPUCH, Individually and on Behalf)	Civil Action No. 3:11-cv-01025
of All Others Similarly Situated,)	
)	<u>CLASS ACTION</u>
Plaintiff,)	
vs.)	Chief Judge Todd J. Campbell
)	Magistrate Judge E. Clifton Knowles
AGFEED INDUSTRIES, INC., et al.,)	
)	
Defendants.)	
)	
)	

[Additional captions appear on next page.]

MOTION TO CONSOLIDATE AND FOR SCHEDULING ORDER BY DEFENDANTS
AGFEED INDUSTRIES, INC., JOHN A. STADLER, GERARD DAIGNAULT, RAYMOND
M. CESCA, CLAY MARSHALL, AND EDWARD PAZDRO

LAWRENCE R. ROSEN, Individually and on) Civil Action No. 3:11-cv-01043
Behalf of All Others Similarly Situated,)
) CLASS ACTION
Plaintiff,)
) Judge John T. Nixon
vs.) Magistrate Judge John S. Bryant
)
AGFEED INDUSTRIES, INC., et al.,)
)
Defendants.)
_____)

JUNE W. DOUGHERTY, Individually and on) Civil Action No. 3:11-cv-01046
Behalf of All Others Similarly Situated,)
) CLASS ACTION
Plaintiff,)
) Judge Kevin H. Sharp
vs.) Magistrate Judge John S. Bryant
)
AGFEED INDUSTRIES, INC., et al.,)
)
Defendants.)
_____)

MICHAEL FAJEN, Individually and on Behalf) Civil Action No. 3:11-cv-01050
of All Others Similarly Situated,)
) CLASS ACTION
Plaintiff,)
) Chief Judge Todd J. Campbell
vs.) Magistrate Judge E. Clifton Knowles
)
AGFEED INDUSTRIES, INC., et al.,)
)
Defendants.)
_____)

Defendants AgFeed Industries, Inc., John A. Stadler, Gerard Daignault, Raymond M. Cesca, Clay Marshall, and Edward Pazdro (collectively “Movants”), pursuant to Fed. R. Civ. P. 42, move the Court for an entry of an order consolidating the above-captioned actions. Further, Movants request an order allowing them sixty days to respond to any consolidated or amended consolidated complaint incorporating the allegations and claims included in these five cases and designated as the operative complaint in the consolidated actions. Counsel for Plaintiffs in the above-captioned actions have alerted counsel for Movants that Plaintiffs do not oppose the relief requested in this motion.

As grounds for the motion, Movants submit that these actions contain common questions of law and fact, and the consolidation of these actions for all matters at issue in the action (including pre-trial purposes and trial) would avoid unnecessary costs and prevent delay. A memorandum of law and a proposed order are filed herewith in support of this motion.

Respectfully submitted,

By: /s/ Overton Thompson

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CERTIFICATE OF SERVICE

I hereby certify that on November 22, 2011, I electronically filed the foregoing document with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to the following and/or served the following via U.S. Mail:

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